

**Item: 11.2**

<b>Report to:</b>	NHS Hull Clinical Commissioning Group Board
<b>Date of Meeting:</b>	28 September 2018
<b>Subject:</b>	Equality & Diversity Action Plan 2018/19 Update
<b>Presented by:</b>	Mike Napier, Associate Director of Corporate Affairs
<b>Author:</b>	Mike Napier / Amanda Heenan Equality and Diversity Specialist

**STATUS OF THE REPORT:**

To approve	<input type="checkbox"/>	To endorse	<input type="checkbox"/>
To ratify	<input type="checkbox"/>	To discuss	<input type="checkbox"/>
To consider	<input type="checkbox"/>	For information	<input checked="" type="checkbox"/>
To note	<input checked="" type="checkbox"/>		

**PURPOSE OF REPORT:**

To set out an update to the 2017/18 CCG Equality & Diversity Action Plan

**RECOMMENDATIONS:**

a To note the updates provided.

**REPORT EXEMPT FROM PUBLIC DISCLOSURE**      No  Yes

If yes, grounds for exemption  
(FOIA or DPA section reference)

<p><b>CCG STRATEGIC OBJECTIVE</b> (See guidance notes below) 1 &amp; 3</p>	<p><b>ASSURANCE FRAMEWORK SPECIFIC OBJECTIVE</b> (See guidance notes below)</p>
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<p><i>Short summary as to how the report links to the CCG's strategic objectives</i></p> <p>The report links to the CCG's statutory duties in relation to the Equality Act 2010.</p>	<p><i>Short summary as to how the report adds assurance to the Assurance Framework</i></p> <p>Strategic Objective 12 – To embed patient and public involvement across the organisation and ensure that the CCG meets its statutory duty under 14Z2 of the Health and Social Care Act.</p>
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<p><b>IMPLICATIONS:</b> <i>(summary of key implications, including risks, associated with the paper),</i></p>	
Finance	Financial implications will occur if the legal requirements of the Equality Act (2010) and its Duty to be applied by the Public Sector (2011) are not upheld.
HR	HR considerations are important in relation to E&D; the interaction between the population and CCG team is essential. There are E&D implications for the way the CCG leadership and culture, as well as the integration of equality and employment legislation in case law.
Quality	Lack of engagement with marginalised and hard to reach groups will affect the quality of provision that is both commissioned and delivered to the population of Hull. The same is true for those employed by Hull CCG if their diversity and equality of opportunities are limited, thus reducing commitment and quality of provision.
Safety	Equality Impact Analysis (EqIAs) which correctly assess the impact on those members of the population (public, patients and staff) with protected characteristics will continue to ensure the safety of commissioned services. Equality and Diversity are key components of the requirements of Health, Safety and Wellbeing.

**ENGAGEMENT:** *(Explain what engagement has taken place e.g. Partners, patients and the public prior to presenting the paper and the outcome of this)*

The report demonstrates on-going engagement with increasingly diverse local interest groups. Continued and sustained engagement is a key requirement of the equality programme of work, and particularly in implementing the Equality Delivery System. This sustained engagement ensures that we are improving fair and equitable access to health services.

**LEGAL ISSUES:** *(Summarise key legal issues / legislation relevant to the report)*

This report demonstrates how we are meeting our duties under the Equality Act 2010 (including our public sector equality duties) and the Human Rights Act 1998.

**EQUALITY AND DIVERSITY ISSUES:** (summary of impact, if any, of CCG's duty to promote equality and diversity based on Equality Impact Analysis (EIA). **All** reports relating to new services, changes to existing services or CCG strategies / policies **must** have a valid EIA and will not be received by the Committee if this is not appended to the report)

	<b>Tick relevant box</b>
An Equality Impact Analysis/Assessment is not required for this report.	<b>X</b>
An Equality Impact Analysis/Assessment has been completed and approved by the lead Director for Equality and Diversity. As a result of performing the analysis/assessment there are no actions arising from the analysis/assessment.	
An Equality Impact Analysis/Assessment has been completed and there are actions arising from the analysis/assessment and these are included in section xx in the enclosed report.	

**THE NHS CONSTITUTION:** (How the report supports the NHS Constitution)

All sections of the NHS constitution are covered and referenced within this document and the adherence to the Equality Act 2010 as there is inter-reliance between the two for both to be fully effective.

# EQUALITY & DIVERSITY PERFORMANCE UPDATE REPORT

## Q2 – SEPTEMBER 2018

### Introduction

The purpose of this report is to highlight the achievements, challenges and next steps in the CCGs performance against its 2018-19 Equality & Diversity (E&D) Outcomes Framework. The Framework is underpinned by the CCG's equality objectives, which are:

1. Ensure patients and public have improved access to information and minimise communications barriers
2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day to day job
3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve
4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs
5. To demonstrate leadership on equality and inclusion and be an active champion of equalities in partnership programmes or arrangements

This work is supported by the E&D Review Group, which meet bi-monthly, led by Mike Napier, the executive E&D lead and Associate Director of Corporate Affairs,

This group also includes:

Sue Lee, Associate Director of Communications and Engagement

Gill Makin, Head of People

Jason Stamp, Lay Member for Patient and Public Involvement

Amanda Heenan, Independent E&D Consultant, Arc of Inclusion

This work is also supported by Michelle Longden, Corporate Affairs Manager, who helps keep track of follow up actions and equality impact assessments.

### Performance

We are approaching the end of quarter 2, we can report the following progress against our equality objectives:

#### **Objective 1:** *Ensure patients and public have improved access to information and minimise communications barriers*

- The Accessible Information Standard (AIS) is a key focus of the NHS provider forum. The CCG is represented by Mike Napier, together with East Riding CCG's equality lead, Nicky Lowe. Work is ongoing to develop a more systemic approach to incorporating the AIS, rather than the current ad hoc initiatives which appear to have limited evidence base.
- There has been a series of briefing notes shared with GP practices, supplemented by a PTL session on 19 September 2018.
- A Down's Syndrome pathway, co-produced with people with Down's and their parents and carers, has been launched. This will include a focus on accessible

communications, addressing specific issues and challenges, and benefitting from the insight provided through co-production

- Weekly PALs reports are now presented to SMT, any equality themes will be reported to the E&D Review Group.
- The CCG has strengthened its internal processes relating to accessible communications, (see Objective 4 below):
  - Reviewing the accessibility statements on all public facing documents
  - Checking website accessibility monthly, with the input of Health Ambassadors
  - Ensuring all staff planning and delivering engagement events and public facing meetings are pro-active about finding out about information access needs, and have up to date information about how to meet these needs.
- The CCG continues to fund interpretation and translation services for the use of GP practices and dentists. Information about update by language and practice is regularly reviewed. Quality is also monitored as part of the contract monitoring process.

Further work will be undertaken with respect to:

- Raising awareness of the Accessible Information Standard with patient groups, and via HealthWatch.
- Encouraging healthcare providers who meet via the local Provider Forum to approach the AIS in a more systemic way, basing interventions on evidence, and focusing on the communication of information access needs between different providers, and between providers and GP practices.

**Objective 2:** *To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job*

- Equality impact assessments (EqIAs) are now routinely being submitted for approval. Advice is actively been sought from policy and commissioning leads undertaking the assessments. The E&D Review Group are starting to review a selection of 'higher impact' EqIAs collectively (e.g. the IFR policy), which is enriching challenge and providing a wider range of perspectives. EqIAs submitted in Q1 & Q2 for sign-off are included in appendix 1.
- The EqIA guidelines and templates have been refreshed to incorporate learning from 2017-18 as well as shared good practice (e.g. East Riding CCG's guidelines have helped inform ours, and our commissioning EqIA templates have been used by them).
- An additional EqIA training / coaching session will be delivered in Q3 / 4.
- A measure set out in the framework was the Development of wider E&D forum as collective process for engagement on equalities. This has proved challenging, despite having explored a range of different options. As an alternative approach, the engagement team (Christine Ebeltoft) is leading a programme of

engagement visits to groups supporting protected characteristics. This will include general discussion about barriers to accessing services / issues when accessing. The original EDS engagement work done in 2015 will form a foundation for this engagement, checking in with the groups / forums spoken to in 2015, as well as identifying gaps in engagement, or particular areas of inequality that have not yet been addressed or sufficiently explored (e.g. gender health inequalities and transgender inclusion).

**Objective 3:** *Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve*

It is recognised that the CCG is underrepresented in the diversity of its workforce in terms of ethnicity / nationality, and just 2% of staff have disclosed a disability. It is also recognised that potential challenges with increasing workforce diversity may be limited dependent on levels of recruitment requirements. Given that, steps taken to encourage a more diverse workforce include:

- Reviewing recruitment paperwork and guidelines to ensure that diversity and inclusion are a conscious part of the recruitment process.
- The CCG promotes itself as a Disability Confident and Mindful Employer.
- We are broadening out the net of where vacancies are advertised, and the HR and engagement teams are working together to identify existing key stakeholder groups.
- Relationships with Pathway Plus are being further developed for supported work experience for people with Learning Disabilities.

Strong progress has been made with respect to staff engagement and wellbeing, including:

- The continued development and strengthening of the staff wellbeing group (established following concerns raised in previous staff surveys and EDS engagement relating to bullying and harassment and staff wellbeing).
- Workplace champions have been identified and have received Mental Health First Aid training. Now training is complete, the focus is for MH First Aiders to pro-actively encourage involvement across the CCG and demonstrate support available. This can be done through existing communications methods and regular slot in staff newsletter.
- This has led to improved staff survey results in 2018 and increased levels of engagement across the workforce.

Staff appraisals now include E&D objectives, however staff awareness the relevance of E&D objectives to their day to day roles needs to be strengthened. Although all staff have undertaken mandatory E&D training, and many the supplementary equality impact assessment sessions, further development is needed, on an ongoing basis. Suggest 'bite-sized' sessions at team meetings / development days.

**Objective 4:** *Ensure that the NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs*

- The access needs of staff and visitors to the CCG are prioritised and met, this includes checking the access needs of visitors before meetings are booked.
- All CCG events include a risk and access assessment. Attendees are asked to provide information about their access and dietary needs. Information about venues is provided in advanced.
- The CCG has strengthened its internal processes relating to accessible communications, (cross reference with Objective 1)
  - Reviewing the accessibility statements on all public facing documents
  - Checking website accessibility monthly, with the input of Health Ambassadors
  - Ensuring all staff planning and delivering engagement events and public facing meetings are pro-active about finding out about information access needs, and have up to date information about how to meet these needs

**Objective 5:** *To demonstrate leadership on equality and inclusion and be an active champion of equalities in partnership programmes or arrangement*

This is a new objective for 2018-19, with a view to ensuring that shared commissioning arrangements level up with respect to E&D (rather than levelling down in the absence of a conscious focus on E&D). The CCG should also continue to participate and contribute to regional and national E&D insight and debate, as well as establish a leadership role with providers (outwith the contract monitoring process). The importance of collaborating with local providers and partners to celebrate Hull's diversity, is also encapsulated in this objective. Progress to date includes:

- Attendance at the Y&H NHS Equality Leads Network.
- Recent attendance at an Equality & Diversity Council workshop regarding EDS3.
- Sue Lee has been invited to represent CCG at HEY group looking to celebrate diversity, led by Lou Beadle - Head of Patient Experience and Engagement

Next steps:

- Host a Hull-based workshop with the purpose of collaborating on E&D, focusing on shared agendas and concerns, eg.:
  - EDS engagement (also explore mapping across to local government equalities framework measures relating to health)
  - Shared approach to WRES<sup>1</sup> & WDES (sharing insight, challenges and best practice)
  - Equality impact assessment
  - Addressing challenges and pressures faced due to wider societal / political issues such as Brexit

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<sup>1</sup> WRES = Workforce Race Equality Standard; WDES = Workforce Disability Equality Standard

**APPENDIX 1**

**EQUALITY IMPACT ASSESSMENT'S**  
**2017 / 2018**

<b>Name of Document</b>	<b>Changes requested</b>	<b>Date Approved by Associate Director of Corporate Affairs / Equality and Diversity Specialist</b>
Community Eating Disorders Service Specification	Changes required prior to approval	
Pediatric Speech and Language Therapy Service Project Approval	Changes required prior to approval	
Safeguarding Supervision		
Secondment Policy		
West Hull Health Hub Development		
IR35 Off Payroll Worker Policy	Approved without need for changes	03.09.17
Redress Policy	Approved without need for changes	11.09.17
Equality and Diversity Policy	Approved without need for changes	14.09.17
Development and Management of Organisational Policies, Procedures and Guidelines Policy	Approved without need for changes	15.09.17
Redeployment Policy	Approved without need for changes	27.09.17
Clinical Peer Review Service Specification	Changes required prior to approval	28.09.17
COSHH Policy	Approved without need for changes	05.10.17



Display Screen Equipment Policy	Approved without need for changes	05.10.17
Fire Safety Policy	Approved without need for changes	05.10.17
Health and Safety Policy	Approved without need for changes	05.10.17
Community Cardiology Service Review	Changes required prior to approval	01.11.17
Budget Upload Procedure	Approved without need for changes	03.11.17
Data Protection and Confidentiality Policy	Approved without need for changes	03.11.17
Finance Guidelines Policy	Approved without need for changes	03.11.17
Fixed Assets Policy	Approved without need for changes	03.11.17
Information Governance Framework and Strategy	Approved without need for changes	03.11.17
Information Security Policy	Approved without need for changes	03.11.17
Losses and Special Payments Policy	Approved without need for changes	03.11.17
Making Payments using a Payment Request Form Policy	Approved without need for changes	03.11.17
Making Payments using Payment Request Form Procedure	Approved without need for changes	03.11.17
Pay Advances Procedure	Approved without need for changes	03.11.17
Payment of Supplier Invoices Policy	Approved without need for changes	03.11.17
Petty Cash Procedure	Approved without need for changes	03.11.17
Raising Debtor Requests Procedure	Approved without need for changes	03.11.17

Receipt of Cash and Cheques Policy	Approved without need for changes	03.11.17
Subject Access Request Policy	Approved without need for changes	03.11.17
Updating Allocations and Financial Plan Procedure	Approved without need for changes	03.11.17
Writing off Bad Debts Policy	Approved without need for changes	03.11.17
Minor Surgery Service Review	Approved without need for changes	06.11.17
Commissioner Safeguarding including standards for providers Policy	Changes required prior to approval	19.12.17
Financial Policy - Professional Accountancy Study	Changes required prior to approval	19.12.17
Lease Car Policy	Approved without need for changes	19.12.17
Professional Registration Policy	Approved without need for changes	19.12.17
Purchasing Cards	Changes required prior to approval	19.12.17
Confidentiality Audit Policy	Changes required prior to approval	22.12.17
Driving for Work Policy	Changes required prior to approval	22.12.17
Email Policy	Approved without need for changes	22.12.17
Lone Working Policy	Approved without need for changes	22.12.17
Manual Handling Policy	Approved without need for changes	22.12.17
Mobile Working Policy and Guidelines	Approved without need for changes	22.12.17
Pay Protection	Changes required prior to approval	22.12.17

Records Management Standards and Procedure Guidance	Approved without need for changes	22.12.17
Media Policy	Approved without need for changes	11.01.18
Financial Policy and Procedure	Changes required prior to approval	28.02.18
Managing Work Performance	Changes required prior to approval	01.03.18
Provision and Use of Free Gifts, Prizes and Incentives	Changes required prior to approval	27.04.18
Flexitime Policy	Changes required prior to approval	08.05.18
Hull Wheelchair Service Review	Changes required prior to approval	16.05.18
Portable Appliance Testing (PAT) Policy	Approved without need for changes	21.06.18
Smoke Free Policy	Approved without need for changes	21.06.18
Expenses Policy	Changes required prior to approval	31.07.18
Individual Funding Request Policy	Changes required prior to approval	07.08.18
On Call Policy	Changes required prior to approval	31.08.18
Sensory Processing Disorder	Changes required prior to approval	04.09.18
Acceptable Computer Use Policy	Changes required prior to approval	10.09.18